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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
PG&E Corporation,
and
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

[] Affects PG&E Corporation
[] Affects Pacific Gas and Electric Company
[x] Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11
Lead Case, Jointly Administered

**NOTICE OF HEARING ON MOTION
FOR RELIEF FROM AUTOMATIC STAY
TO PERMIT THE COURTS OF THE
STATE OF CALIFORNIA TO CONDUCT
A JURY TRIAL AND RELATED
PRETRIAL AND POST TRIAL
MATTERS IN CONNECTION WITH
CREDITOR, JOHN LEE CLARK'S
COMPLAINT FOR DAMAGES, OR IN
ALTERNATIVE, FOR ABSTENTION**

Date: July 7, 2020
Time: 10:00 a.m.
Place: Courtroom 17450 Golden Gate
Avenue, 16th Floor
San Francisco, CA
Judge: Hon. Dennis Montali

Objection Deadline: July 2, 2020, 4:00 p.m.
PST

TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED
PARTIES:

PLEASE TAKE NOTICE that a hearing on the MOTION FOR RELIEF FROM
AUTOMATIC STAY TO PERMIT THE COURTS OF THE STATE OF CALIFORNIA TO

1 CONDUCT A JURY TRIAL AND RELATED PRETRIAL AND POST TRIAL MATTERS IN
2 CONNECTION WITH CREDITOR, JOHN LEE CLARK'S COMPLAINT FOR DAMAGES, OR
3 IN ALTERNATIVE, FOR ABSTENTION ("the Motion") filed by John Lee Clark ("Plaintiff")
4 will be heard by the Honorable Dennis Montali on **July 7, 2020 at 10:00 a.m.**

5 The hearing will not be conducted in the presiding judge's courtroom but instead will be
6 conducted by telephone or video. All interested parties should consult the Bankruptcy Court's
7 website at www.canb.uscourts.gov for information about court operations during the COVID-19
8 pandemic. The Bankruptcy Court's website provides information regarding how to arrange a
9 telephonic or video appearance. If you have any questions regarding how to appear at a court
10 hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live
11 Chat feature on the Bankruptcy Court's website.

12 In the Motion, Plaintiff requests that the Bankruptcy Court (a) grant relief from stay to
13 allow Plaintiff's pending state court tort claims to be liquidated in the extant state court
14 proceeding, or alternatively, (b) abstain from adjudicating Plaintiff's claims against Pacific Gas &
15 Electric Company. Plaintiff's claims arise out of and are resulting from an explosion allegedly
16 caused by PG&E's equipment, and Plaintiff's resulting injuries. Plaintiff acknowledges actual
17 payment and collection of any eventual putative judgment will be as proscribed by the terms of
18 PG&E's chapter 11 plan and ultimate confirmation order.

19 The Motion is brought pursuant to 28 USC § 1334(c)(1) and 11 USC § 362(d)(1) for cause.
20 The Motion is based on this Notice, the Motion, the Declaration of John Demas filed in support of
21 the Motion and upon all other pleadings and papers on file herein and such oral and documentary
22 evidence as may be presented at the hearing on the Motion.

23 PLEASE TAKE FURTHER NOTICE that the Debtor is advised to appear personally or by
24 counsel at the preliminary hearing as provided in Local Rule 4001-1(a) and that failure to so
25 appear may result in the Court granting the relief requested without further hearing, including the
26 lifting of the automatic stay to allow Plaintiff to pursue the litigation in state court, including
27 pretrial proceedings, trial, post-trial motions and any appellate proceedings in or in connection
28 with the state court litigation.

1 PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion must
2 be in writing, filed with the Bankruptcy Court, and served on the counsel for Plaintiff at the
3 above-referenced address so as to be received by **no later than 4:00 p.m. (Pacific Time) on**
4 **July 2, 2020.** Any opposition or response must be filed and served on all "Standard Parties" as
5 defined in the Amended Order Implementing Certain Notice and Case Management Procedures
6 entered by the Court on May 13, 2019 ("Case Management Order"). **Any relief requested in the**
7 **Motion may be granted without a hearing if no opposition is filed and served in accordance**
8 **with the Case Management Order.** In deciding the Motion, the Court may consider any other
9 document filed in these Chapter 11 Cases and related Adversary Proceedings.

10 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting papers
11 can be viewed and/or obtained: (i) by accessing the Court's website at www.canb.uscourts.gov, (ii)
12 by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA
13 94102, or (iii) from the Debtor's notice and claims agent, Prime Clerk LLC, at
14 <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 for U.S. based parties; or
15 (929) 333-8977 for International parties or by email at: pgeinfo@primeclerk.com. Note that a
16 PACER password is needed to access documents on the Bankruptcy Court's website.
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19 DATED: June 15, 2020

DOWNEY BRAND LLP

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21 By: _____ /s/ Jamie P. Dreher
22 JAMIE P. DREHER
23 Attorneys for John Lee Clark
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